

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

UNITED STATES OF AMERICA,

v.

Case No. 2:19cr189

JAVAID PERWAIZ,

Defendant.

**POSITION OF THE DEFENDANT, JAVAID PERWAIZ,
WITH RESPECT TO SENTENCING FACTORS**

COMES NOW the Defendant, Javaid Perwaiz (“Perwaiz”), by counsel and states as follows for his position on sentencing:

The Defendant and counsel have reviewed and discussed the pre-sentence report and sentencing guidelines. Counsel and the Defendant agree that Part C, paragraphs 108 through 158 accurately set forth Dr. Perwaiz’s personal, educational, employment, health and financial background.

Counsel and the Defendant also agree that Dr. Perwaiz’s criminal history is correctly stated in Part B, paragraphs 101 through 107.

The Defendant pled not guilty to all of the counts against him in the indictment and maintains that his convictions are factually and legally unsubstantiated. The Defendant testified at trial in his own defense and denied violating any laws. The Defendant objects to all the information in the pre-sentence report under part A which encompasses paragraphs

1 through 100. The Defendant objects to all of the factual matters set forth in the pre-sentence report, specifically, all matters that state he was involved in Health Care Fraud, Health Care Fraud (Resulting in Serious Bodily Injury) and False Statements Related to Health Care Matters.

The Defendant also objects to the guidelines and all enhancements in that he maintains that he is not guilty of the offenses he was convicted of and should not be given any sentence.

The Defendant specifically does not waive any issues objected to at trial, in post trial motions, and preserves all objections set forth in this position paper and in the motions filed during the entire case.

Due to the fact that the Defendant maintains his innocence, counsel is not requesting any particular sentence. Both counsel and the Defendant understand that the Court is required to impose a sentence that takes into account all the 18 U.S.C. § 3553 factors and that the Court will rely on the jury verdict and the pre-sentence report in determining the sentence.

Counsel requests that the Defendant be placed at a facility that can provide needed medical treatment.

Respectfully submitted,

JAVAID PERWAIZ

/ s /

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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